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Attorneys for Defendants  
ETHAN QIQI HU, GMBEYE,  
and RAFADIGITAL LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

GOOGLE LLC, a Delaware limited liability  
company,

Plaintiff,

v.

ETHAN QIQI HU, an individual; GMBEYE;  
RAFADIGITAL LLC, a Mississippi limited  
liability company; and DOES 1–20,

Defendants.

Case No. 3:23-cv-02964-JD

**JOINT STIPULATION FOR ENTRY OF  
STIPULATED PERMANENT INJUNCTION**

1 Plaintiff Google LLC (“Google”) and Defendants Ethan Qiqi Hu, GMBEye, and Rafadigital  
 2 LLC, (collectively, “Defendants”) have reached a settlement of this action and hereby stipulate to  
 3 entry of the Stipulated Permanent Injunction attached hereto, which the parties agree is a fair and  
 4 reasonable settlement of their dispute. Google and Defendants (collectively, the “Parties”) stipulate  
 5 and respectfully request as follows:

- 6 1. That the Court enter the Stipulated Permanent Injunction attached hereto<sup>1</sup>;
- 7 2. That Google’s claims against Defendants for breach of contract, violation of Cal. Bus.  
 8 & Prof. Code § 17200 *et seq.*, and false advertising under 15 U.S.C. § 1125 be dismissed with prejudice  
 9 upon the entry of the Stipulated Permanent Injunction;
- 10 3. That this Court retain jurisdiction over the Parties and over this case following the entry  
 11 of the Stipulated Permanent Injunction to enforce the terms of the Stipulated Permanent Injunction  
 12 and the settlement agreement between the Parties; and
- 13 4. That the Parties waive all rights to an appeal from the Stipulated Permanent Injunction;  
 14 however, the Parties preserve their respective rights to appeal any further action arising out of the  
 15 Stipulated Permanent Injunction.

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 26 <sup>1</sup> The parties are mindful of the Court’s February 6, 2024 order, in which it instructed them not to ask  
 27 the Court for an order confirming dismissal of this action based on their settlement agreement under  
 28 FRCP 41(a)(1). ECF No. 34. The parties do not ask the Court to enter an order pursuant FRCP 41(a)(1)  
 and only ask the Court to enter the Stipulated Permanent Injunction attached hereto, to which the  
 parties agreed as a material term of their settlement. Should the Court prefer, the parties are prepared  
 to file a stipulation of dismissal following entry of the Stipulated Permanent Injunction other terms.

1 Dated: March 7, 2024

2 Respectfully submitted,

3  
4 By: /s/ Whitty Somvichian

5 Whitty Somvichian

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15 Attorneys for Plaintiff  
GOOGLE LLC

16  
17 Dated: March 7, 2024

18 Respectfully submitted,

19  
20 By: /s/ David Morales

21 David Morales

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26 ETHAN QIQI HU, GMBEYE, and RAFADIGITAL LLC  
27  
28

**ATTESTATION OF CONCURRENCE IN FILING**

Pursuant to Civ. L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from counsel for Defendants.

Dated: March 7, 2024

By: /s/ Whitty Somvichian  
Whitty Somvichian

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